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IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

FILED RICHARD W. NAGEL CLERK OF COURT

UNITED STATES OF AMERICA :

VS.

JUAN TAMAYO-BELTRAN

21 U.S.C. § 841(a)(1)

VICTOR LOPEZ CRISANTA MONTES-RAMIREZ

21 U.S.C. § 841(b)(1)(A)(i) 21 U.S.C. § 841(b)(1)(B)(i)

CRYSTAL THOMAS : NICHOLAS T. JONES

21 U.S.C. § 846

JAMES V. TAYLOR

MARTHA SUE HARNESS SCOTT A. MILLER LOUIE K. SKIVERS

HEATHER D. SOWERS ERICK HERNANDEZ RYAN P. MCGINNIS

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE:

Conspiracy to Possess with Intent to Distribute Heroin

Between on or about December of 2018, through April 20, 2021, the exact dates being unknown, in the Southern District of Ohio, the defendants, JUAN TAMAYO-BELTRAN, VICTOR LOPEZ, CRISANTA MONTES-RAMIREZ, and CRYSTAL THOMAS, did knowingly, intentionally, and unlawfully conspire with others, both known and unknown to the United States, to possess, with the intent to distribute, one kilogram or more of a substance containing a detectible amount of Heroin, a Schedule I controlled substance, and co-defendants, NICHOLAS T. JONES, JAMES V. TAYLOR, MARTHA SUE HARNESS, SCOTT A. MILLER, LOUIE K. SKIVERS, HEATHER D. SOWERS, ERICK HERNANDEZ, and RYAN P. MCGINNIS, did knowingly, intentionally, and unlawfully conspire with others, both known and unknown to the United States, to possess, with the intent to distribute, one hundred grams or more of a substance containing a detectible amount of Heroin, a Schedule I controlled substance, in violation of 21 U.S.C. §841(a)(1),

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§841(b)(1)(A)(i) and §841(b)(1)(B)(i).

All in violation of 21 U.S.C. § 846.

A TRUE BILL.

s/Foreperson FOREPERSON

VIPAL J. PATEL

Acting United States Attorney

MICHAEL J. HUNTER

Assistant United States Attorney